

1 LAW OFFICE OF SHAWN R. PEREZ
 2 Shawn R. Perez (NV SBN: 10421)
 3 Shawn711@msn.com
 4 7121 W. Craig Rd, #113-38
 5 Las Vegas, NV 89129
 6 T: 702-485-3977
 7 F: 702-442-7095

8
 9 TACSID LAW APC
 10 John S. Manzano, Esq. (CA SBN: 170546)
 11 law@tacsid.com
 12 3424 W. Carson Street, Suite 600
 13 Torrance, CA 90503
 14 T/F: 424-234-5200

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 16 *Attorneys for Plaintiffs*
 17 TACSID APC and KENT LIMSON

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 28 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 TACSID APC, a California corporation;
 11 and KENT LIMSON, an individual,

12 Case No: 2:24-cv-02284-APG-EJY

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 28 **JOINT STIPULATION AND ORDER**
STAYING DISCOVERY PENDING RULING
ON MOTIONS TO DISMISS

10 Plaintiffs
 11 v.
 12 JACKIE ROBINSON, an individual; ALL
 13 NET LAND DEVELOPMENT, LLC, a
 14 Nevada Limited Liability Company; ALL
 15 NET, LLC, a Nevada Limited Liability
 16 Company; DRIBBLE DUNK, LLC, a
 17 Nevada Limited Liability Company; AGS
 18 ASSURETY, LLC, a Nevada Limited
 19 Liability Company; TIMOTHY J.
 20 ARELLANO, an individual; DAVID
 21 LOWDEN, an individual; MESSNER
 22 REEVES LLP, a Colorado Limited
 23 Liability Partnership; TORBEN WELCH,
 24 an individual; LORING JACOBS, an
 25 individual, and DOES 1 THROUGH 100
 26 INCLUSIVE,

27 Defendants.

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 29 **JOINT STIPULATION AND ORDER STAYING DISCOVERY PENDING RULING ON MOTIONS TO DISMISS**

1 Pursuant to L.R. 7-1, Plaintiffs and Defendants, by and through undersigned counsel,
 2 stipulate to stay all discovery in this action pending the Court's ruling on Defendants' Motions to
 3 Dismiss Plaintiffs' First Amended Complaint (ECF Nos. 100, 101, and 102), as set forth below.

4 **RECITALS**

5 WHEREAS, on September 2, 2025, Plaintiffs TACSIS APC and KENT LIMSON filed
 6 their First Amended Complaint (ECF No. 97).

7 WHEREAS, on September 12, 2025, Defendants MESSNER REEVES, LLP and
 8 TORBEN WELCH filed a Stipulation to Extend Time to Respond to Plaintiffs' First Amended
 9 Complaint, extending the time for all Defendants to respond by October 7, 2025, (ECF No. 98).

10 WHEREAS, on October 7, 2025, Defendants MESSNER REEVES, LLP, and TORBEN
 11 WELCH filed their Motion to Dismiss the First Amended Complaint (ECF No. 100).

12 WHEREAS, on October 7, 2025, Defendants LORING JACOBS; JACKIE ROBINSON;
 13 ALL NET, LLC; and DRIBBLE DUNK, LLC, filed their Motion to Dismiss the First Amended
 14 Complaint (ECF No. 101).

15 WHEREAS, on October 7, 2025, Defendants ALL NET LAND DEVELOPMENT, LLC,
 16 and DAVID LOWDEN filed their Motion to Dismiss the First Amended Complaint (ECF No.
 17 102).

18 WHEREAS the parties have conferred and agreed that a stay of discovery pending the
 19 Court's ruling on Defendants' Motions to Dismiss the First Amended Complaint (ECF Nos. 100,
 20 101, and 102) is appropriate and will conserve resources. *See Glass v. Global Widget, LLC*, 2020
 21 U.S. Dist. LEXIS 32292, No. 2:19-cv-1906-MCE-KJN, *2 (E.D. Cal. Feb. 25, 2020) ("Without
 22 commenting on the merits of Defendant's motion, it is possible that all claims brought by Plaintiff
 23 could be dismissed with prejudice. Thus, a stay of discovery is in line with the principles of
 24 judicial economy and the Federal Rules of Civil Procedure.").

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28 **JOINT STIPULATION AND ORDER STAYING DISCOVERY PENDING RULING ON MOTIONS TO DISMISS**

1 **THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:**

2 1. All discovery in this action shall be stayed pending the Court's ruling on
3 Defendants' Motions to Dismiss.

4 2. All parties will reconvene under Rule 26(f) within 21 days following the ruling on
5 the last of the Motions (ECF Nos. 100, 101, and 102).

6 Respectfully submitted.

7 *(Signatures to follow on Next Page)*

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JOINT STIPULATION AND ORDER STAYING DISCOVERY PENDING RULING ON MOTIONS TO DISMISS

1 DATED: December 5, 2025

2 TACSI S LAW APC

3 */s/ John S. Manzano*

4 John S. Manzano
5 Lorrie A. Walton
6 Ryan M. Arakawa
7 Francis Richard Manzano
8 3424 W. Carson Street, Ste. 600
9 Torrance, CA 90503
10 law@tacsis.com

11 LAW OFFICE OF SHAWN R. PEREZ
12 Shawn R. Perez
13 7121 W. Craig Rd., #113-38
14 Las Vegas, NV 89129
15 Shawn711@msn.com

16 *Attorneys for Plaintiffs*

17 DATED: December 5, 2025

18 KAEMPFER CROWELL

19 */s/ Kris J. Kalkowski*

20 Kris J. Kalkowski
21 Lyssa S. Anderson
22 1980 Festival Plaza Drive, Ste. 650
23 Las Vegas, NV 89135

24 *Attorneys for Defendants*

25 *JACKIE ROBINSON, ALL NET LLC,
26 DRIBBLE DUNK LLC and LORING JACOBS*

27 IT IS SO ORDERED.

28 DATED: _____

DATED: December 5, 2025

GORDON REES SCULLY MANSUKHANI

/s/ William G. Dewey

William G. Dewey
John M. Palmeri
Robert E. Schumacher
300 So. 4th Street, Ste. 1550
Las Vegas, NV 89101
rshumacher@grsm.com

GORDON REES SCULLY MANSUKHANI

John M. Palmeri
William G. Dewey
555 Seventeenth Street, Ste. 3400
Denver, CO 80202
jpalmeri@grsm.com
wdewey@grsm.com

Attorneys for Defendants
MESSNER REEVES AND TORBEN WELCH

DATED: December 5, 2025

HANRATTY LAW GROUP

/s/ Jon A. Weininger

Kevin M. Hanratty
1815 Village Center Circle, Ste. 140
Las Vegas, NV 89134
kevinh@hanrattylawgroup.com

JEFFER MANGELS BUTLER &
MITCHELL

Jon A. Weininger
3 Park Plaza, Ste. 1100
Irvine, CA 92614
jweininger@jmbm.com

Attorneys for Defendants
ALL NET LAND DEVELOPMENT LLC and
DAVID G. LOWDEN

UNITED STATES DISTRICT JUDGE

JOINT STIPULATION AND ORDER STAYING DISCOVERY PENDING RULING ON MOTIONS TO DISMISS